

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) Case No. 3:22-CR-00078
ROBIN SMITH,) Judge Richardson
Defendant.)

MOTION FOR ENTRY OF FORFEITURE MONEY JUDGMENT

The United States of America moves for entry of a Consent Order of Forfeiture consisting of a \$28,263.26 United States currency Money Judgment as to Count One of the Information (“Order of Forfeiture”). *See* Fed. R. Crim. P., 32.2 (a), (b)(1)(A), (b)(2)(A), (b)(4)(B), and (c)(1). As grounds the United States respectfully submits:

1. The Forfeiture Allegation of the Information gave the Defendant notice of the United States' intent to seek forfeiture in the event of a conviction as to Count One, and the Defendant has had an opportunity to be heard on the matter. (ECF No. 1: Information.)

2. Further, the Defendant pled guilty to a violation of Honest Services Wire Fraud, in violation of Title 18, United States Code, Sections 1343 and 1346 as charged in Count One, for which forfeiture is authorized by 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2641. (ECF No. 14: Order Accepting Plea Petition; ECF No. 15: Plea Agreement.)

3. The Defendant acknowledges that \$28,263.26 United States currency is subject to forfeiture as to Count One as it represents property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including but not limited to a money judgment in the

amount to be determined representing the value of the proceeds of the offense in violation of 18 U.S.C. §§ 1343 and 1346 to which she is pleading guilty. (ECF No. 15: Plea Agreement.)

4. As provided in the Plea Agreement, the Defendant consents to the entry of the forfeiture order requested herein, as well as other stipulations as set forth in her Plea Agreement. (*Id.*, at ¶ 3.)

Based on the foregoing, and the agreements and factual statements contained in the Defendant's Plea Agreement, the United States respectfully requests entry of the forfeiture money judgment requested herein.

A proposed Forfeiture Money Judgment is attached hereto for the Court's convenience.

Respectfully submitted,

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